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 & CO., INC., FREDERIC
 8 RIESTERER, and DAVID GUETTA

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10 UNITED STATES DISTRICT COURT
 11 CENTRAL DISTRICT OF CALIFORNIA
 12 SOUTHERN DIVISION

13 BRYAN PRINGLE, an individual,

14 Plaintiff,

15 v.

16 WILLIAM ADAMS, JR.; STACY
 FERGUSON; ALLAN PINEDA; and
 17 JAIME GOMEZ, all individually and
 collectively as the music group The
 18 Black Eyed Peas, et al.,

19 Defendants.

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Case No. SACV 10-1656 JST(RZx)

Hon. Josephine Staton Tucker
Courtroom 10A

**NOTICE OF MOTION BY
 DEFENDANTS SHAPIRO
 BERNSTEIN & CO., INC.,
 FREDERIC RIESTERER AND
 DAVID GUETTA FOR SANCTIONS
 AGAINST PLAINTIFF AND HIS
 COUNSEL PURSUANT TO FED. R.
 CIV. P. 11**

Complaint Filed: October 28, 2010
 Trial Date: May 8, 2012
 Motion Hearing Date: April 16, 2012

1 PLEASE TAKE NOTICE that, on April 16, 2012 or as soon thereafter as
2 counsel may be heard in the courtroom of the Honorable Josephine Staton Tucker,
3 United States District Judge, Central District of California, located at the Santa Ana
4 Courthouse, 411 West Fourth Street, Courtroom 10A, Santa Ana, California 92701-
5 4516, Defendants Shapiro, Bernstein & Co, Inc., Frederic Riesterer and David
6 Guetta (collectively “Defendants”), will and hereby do move for an Order imposing
7 sanctions on Plaintiff Bryan Pringle and his present and former counsel—Dean A.
8 Dickie and Kathleen E. Koppenhoefer, individually as well as jointly and severally
9 with Miller, Canfield, Paddock & Stone, P.L.C.; Ira P. Gould and Ryan L. Greely,
10 individually as well as jointly and severally with Gould Law Group; and George L.
11 Hampton IV and Colin C. Holley, individually as well as jointly and severally with
12 HamptonHolley LLP.

13 This Motion is made pursuant to Rule 11 of the Federal Rules of Civil
14 Procedure, the Local Rules of this Court, and is based on this Notice of Motion;
15 Defendants’ Memorandum of Law in Support of Motion for Sanctions Against
16 Plaintiff and His Counsel Pursuant to Fed. R. Civ. P. 11; the Declaration of Tal E.
17 Dickstein with exhibits thereto; the Court file; any reply Defendants may make; and
18 any further papers or argument as may be presented to the Court prior to or at the
19 hearing on this motion, or subsequent thereto as directed by the Court.

20 Pursuant to Fed. R. Civ. P. 11(c)(2), this motion and supporting documents
21 were served on Plaintiff’s counsel and all counsel of record on February 6, 2012,
22 more than 21 days prior to the filing of this motion.

23 This motion is made following Defendants’ participation in a conference of
24 counsel pursuant to Local Rule 7-3 held on June 27, 2011, as well as Defendants’
25 invitation to hold an additional conference of counsel following service of this
26 motion, which invitation was declined by Plaintiff’s counsel.

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Dated: March 1, 2012

LOEB & LOEB LLP

By: *s/ Tal E. Dickstein*

Donald A. Miller
Barry I. Slotnick
Tal E. Dickstein

Attorneys for Defendants
SHAPIRO, BERNSTEIN & CO., INC.,
FREDERIC RIESTERER and DAVID
GUETTA

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